

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

EMMA GOIDEL, ILANA LEE, MADELEINE  
LEE, And LESLEY BROWN, On Behalf of  
Themselves and All Others Similarly Situated,

*Plaintiffs,*

- against -

AETNA LIFE INSURANCE COMPANY,

*Defendant.*

Case No. 1:21-cv-07619 (VSB)

**DECLARATION OF BRYN  
BRIDLEY**

BRYN BRIDLEY, hereby declares under penalty of perjury as follows:

1. I am the Vice President of Business Development for Atticus Administration LLC (“Atticus”). My business address is 1295 Northland Drive, Suite 160, St. Paul, Minnesota 55120. My telephone number is (612) 383-2505. I have worked in the class action settlement administration industry for more than twenty years, including management roles at two other nationally recognized class action administration firms. I have been employed at Atticus since 2018. I am over twenty-one years of age and am authorized to make this declaration on behalf of Atticus and myself.

2. I submit this declaration to (i) attest to Atticus’ qualifications to serve as the “Administrator” in this settlement, (ii) to provide an overview of the proposed Notice Plan, and (iii) document the estimated costs of administration.

**I. QUALIFICATIONS**

3. Atticus was founded in 2016 by a team of experienced legal, financial, digital marketing, and brand professionals to provide innovative and cost-effective notice campaigns and claims administration services to the legal sector. Atticus provides services in class action

settlements involving, *inter alia*, civil rights, consumer fraud, financial services, ERISA and pension matters, data breaches, insurance, ADA, civil rights, class certification notifications, Belaire-West notifications, and employment matters, including wage and hour, PAGA and FLSA collective actions.

4. Atticus's core competencies include pre-certification mailings, class notice, claims administration including the processing of claim forms, claim validation and anti-fraud detection, data preparations and data management, accounting services, tax reporting, qualified settlement fund management, escrow services, and the calculation and distribution of funds. Since its inception, Atticus has provided administrative services in nearly 1,000 class, collective or PAGA settlements and has disbursed approximately \$1.24 billion in settlement funds. Among Atticus' founders and team members, we have collectively administered over 3,000 settlements and have disbursed over \$3 billion in settlement funds. Atticus' *curriculum vitae* is attached as **Exhibit A**.

## **II. NOTICE PLAN**

### Mailed Notice

5. Upon the Court's entry of a preliminary approval Order, Atticus will disseminate Notice to unique individuals on the list of Potential Class Members in accordance with the terms of the Settlement Agreement.<sup>1</sup> A complete and thorough review of the list of Potential Class Members' content will be conducted in advance of Notice mailing to ensure that the content is complete and accurate for sending Notice. The list of Potential Class Members will also be processed through the National Change of Address database maintained by the United States Postal Service ("USPS") before notice is mailed. This process provides address updates for anyone included in the list of Potential Class Members that has filed a change of address card with the

---

<sup>1</sup> All defined terms have the same meaning as they do in the Settlement Agreement. Salzman Decl., Ex. 1.

USPS in the past four years. Address changes received through NCOA processing will be used for Notice dissemination.

6. Every Potential Class Member will be sent a “Claim Form Package” by U.S. first-class mail. The packet will include a Summary Notice, Out-of-Pocket Expense Submission form, Miscellaneous Harm Submission form, and Proof of Greater Covered Care form, and the long form Notice specific to the recipient’s Category A, B, or C designation. True and correct copies of the Summary Notice and Published Notice (*see* Publication and Media Plan, Paragraphs 11–13, *infra*) are attached as **Exhibit B**; true and correct copies of the Category A, B, and C, long form Notices are attached as **Exhibit C** (together with Exhibit B, the “Notices”); and true and correct copies of the Out-of-Pocket Expense Submission, Miscellaneous Harm Submission, and Proof of Greater Covered Care forms that all Class Members may potentially file are attached as **Exhibit D**. Potential Category B Class Members will also receive an Attestation Form, and potential Category C Class Members will receive the Attestation Form and Claim Form Submission. True and correct copies of the Attestation Form and Claim Form Submission are attached as **Exhibit E** and **Exhibit F**, respectively.

7. The long form Notices include an overview of the action, the terms of the proposed settlement, information on: (1) the nature of this litigation, the Settlement Class at issue, the identity of Class Counsel, and the essential terms of the Settlement Agreement and settlement; (2) how to participate in the settlement; (3) when settlement payments will be distributed; (4) Class Counsel’s forthcoming application for attorneys’ fees and service awards to the Named Plaintiffs (5) this Court’s procedures for final approval of the Settlement Agreement and settlement, including the date, time, and place of the final approval hearing; (6) how to challenge or opt-out

of the settlement, if they wish to do so; (7) how to contact Atticus; and (8) the settlement website address for more information regarding the Settlement Agreement.

8. Any Claim Form Packages that are returned as undeliverable will be processed in our internal management system and if applicable, remailed to any forwarding address provided by the USPS for persons who filed change of address cards with the USPS, but the forwarding period has expired. Potential Class Member records associated with undeliverable Claim Form Packages that do not include forwarding address information will be sent to a professional service for tracing and the Claim Form Packages will be remailed to all address updates returned. Atticus sends records for tracing on an ongoing basis—typically every day—and Claim Form Packages will be remailed as alternative address information is received. Atticus has a variety of tracing tools at its disposal for address tracing including use of a proprietary data repository, such as CLEAR searches, to manually search for individuals and/or hiring professional firms to find absent Potential Class Members.

9. Atticus will also establish a dedicated post office box, e-mail inbox, a website, and toll-free phone number to allow Potential Class Members to contact Atticus with any specific requests or questions.

#### Reminder Notice

10. Pursuant to the terms of the Settlement Agreement, Atticus will send a Reminder Notice to all Potential Class Members who have not submitted any forms sixty days prior to the Bar Date, and again thirty days prior to the Bar Date.

#### Publication and Media Plan

11. A comprehensive media plan will also be implemented in an effort to give notice to as many potential Class Members as is reasonably practicable. The media plan includes

placement of a modified version of the Summary Notice (“Publication Notice Plan”) on various media outlets of interest to and/or frequented by members the target audience such as *The New York Times*, *The Advocate*, and *Parents Magazine*, purchased display ads and digital notice banners, keyword search advertising, targeted social media advertising and a dedicated Facebook page. A true and correct copy of the Publication Notice Plan is attached as **Exhibit G**. True and correct copies of sample digital and social media advertisements are attached as **Exhibit H**.

12. Atticus collaborated with MRI, a nationally accredited research firm that provides consumer demographics, product and brand usage, and audience exposure, and GfK, a trusted source of relevant market and consumer information to determine that the over-inclusive target audience of the Class would most likely include adults between the ages of 23 and 54 residing in the New York, New Jersey, and Connecticut tri-state area who are in a committed relationship and are members of the LGBTQ+ community, seeking or are of childbearing age, who purchased healthcare insurance and related products, and sought fertility or related services with a household income over \$55,000 and under \$250,000.

13. Using social media outlets and strategic and targeted advertising, the media plan is expected to reach approximately 78% of Potential Class Members, with each Potential Class Member seeing an advertisement or social media post related to the Settlement an average of four times, to generate an estimated three to six million impressions.

#### Settlement Website

14. Atticus has secured the domain [www.InfertilityInsuranceSettlement.com](http://www.InfertilityInsuranceSettlement.com) to serve as the settlement website for this action. The website URL address will be printed in all of the mailed Claim Form Packages, will be a clickable link in all of the internet and social media advertisements, and will be promoted on a dedicated case-specific Facebook page and toll-free

telephone information line. The mailed Claim Form Packages will also include QR codes that can be scanned using mobile devices that will direct recipients to the appropriate online forms for them, depending on whether they are potential Category A, B, and C Class Members.

15. The website can be viewed in English and Spanish and will provide visitors with an overview of the settlement and include answers to frequently asked questions, access to documents filed with the Court—including the Settlement Agreement, the Category A, B, and C long form Notices, papers filed seeking preliminary approval of the Settlement Agreement, the Court's orders, a summary of key settlement dates and deadlines, and information on how to contact Atticus for further information or assistance. Potential Class Members will have access to secure online filing where they may complete and submit the applicable and/or optional forms and any relevant support documentation if they so choose.

16. The website will be made public in conjunction with the dissemination of Claim Form Packages or as otherwise requested by the Court or the Parties to this matter and will remain accessible until sometime after award checks are distributed, as directed by the Parties.

### **III. ADMINISTRATIVE COSTS**

17. Atticus estimates the costs of administration for this action to be \$130,599. A true and correct copy of the estimate is attached hereto as **Exhibit I**.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on: May 3, 2024  
St. Paul, Minnesota



Bryn Bradley